

EXHIBIT D

Supplemental Declaration of Lisa Cochran with Attachments

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

STATE OF TENNESSEE,)	
<i>ex rel.</i> JONATHAN SKRMETTI,)	
ATTORNEY GENERAL and REPORTER,)	
)	
<i>and</i>)	
)	
COMMONWEALTH OF KENTUCKY,)	
<i>ex rel.</i> DANIEL CAMERON,)	
ATTORNEY GENERAL)	
)	
Plaintiffs,)	
)	
vs.)	
)	
IDEAL HORIZON BENEFITS, LLC, et al.,)	

DECLARATION OF LISA COCHRAN

I, Lisa Cochran, hereby state that I have personal knowledge of the facts set forth below, and the facts contained herein are true to the best of my recollection, except for those facts which are alleged to be upon information and belief, and as to those allegations, I hereby certify I believe the same to be true. If called as a witness, I would testify as follows:

1. I, Lisa Cochran, am supplementing my prior declaration that was executed on February 1, 2023 concerning the above captioned case and incorporated herein by reference.
2. As of February 22, 2023, the Office of Senior Protection of the Office of the Kentucky Attorney General has processed sixty-one (61) additional complaints concerning Ideal Horizon Benefits, LLC d/b/a Solar Titan USA ("Solar Titan"), since I executed my

February 1, 2023 declaration. This brings the total number of complaints that OSP has processed regarding Solar Titan¹ to 153.

3. Redacted copies of the additional complaints processed since my February 1, 2023 declaration was executed have been incorporated into **Attachment 1** at pages 192 to 311. With the exception of redactions made to protect consumers' privacy and the addition of page numbers for ease of review, the complaints contained within **Attachment 1** are true and authentic copies of complaints received by the Attorney General's Office regarding Solar Titan.

 2/22/2023

Lisa Cochran
Consumer Complaint Investigator/Analyst
Office of Senior Protection
Office of the Kentucky Attorney General

¹ This figure includes complaints submitted on the Office of the Attorney General's Utility Complaint form. Although these complaints are received electronically by the Office of Rate Intervention, a separate division within the Attorney General's Office, OSP still handles the initial intake and processing of these complaints.

ATTACHMENT 1



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **ce3241dc-9df2-4c6f-b745-5830ebdd795b**

Completion Date **8/11/2022 10:47:14 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 N Peters Rd**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **March 2022**

Product or service involved **Solar Panels**

Total Price **42000**Amount Paid **750**

How did you hear about this product or service?

With what other agencies have you filed a complaint? **Better Business Bureau**What action was taken by those agencies? **Yes**Have you hired or retained an attorney? **False**Have you started court action? **False**What action will resolve your complaint? **Either finish the install or cancel the loan, refund payments, and remove the panels without damaging the roof.**

Briefly state the facts of your complaint **Solar panels installed in March 2022. Still waiting on quality inspection since their electrician didn't do quality work and new electrician won't sign off until he reviews install. Inspection can't be done until this is done. Company cannot provide any timeframe on when this will be done. They agreed to reimburse me for loan payments. They now owe me 2 months of payments and just say Accounting has to still approve. If the install isn't done before end of the year, I won't be able to claim tax rebate which is part of the loan agreement to pay 30% of loan with the rebate.**

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **08/11/22**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information **Mosaic**Account/Loan Number Email Address **loanservicing@joinmosaic.com**

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **dec26d84-e3fd-4f64-8ccb-2f664fe033ff**

Completion Date **6/7/2022 4:19:13 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 N Peters Rd**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail **media@solartitanusa.com**

Was a contract signed? **True**

Date(s) of transaction **10/02/2021**

Product or service involved **Install of and make operational Solar Power**


Total Price **71,500.00**Amount Paid **\$2436.00**How did you hear about this product or service? **They Contacted Me**With what other agencies have you filed a complaint? **Better Business Bureau**What action was taken by those agencies? **Just Communication that did not get any results**Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **reimbursement of the money I have paid for the system the whole time I have been paying for it and it has not been operational and the completion of the project.**

Briefly state the facts of your complaint **Solar titan stated that they would complete the solar system before we ever made a payment on the system. To Date, the system still is not operational and we have made 6 monthly payments on the system. They have not even come close to fulfilling the promises that they have made to my wife and me. Attached is the agreement we signed as well as a docusign agreement where they ask me not to disparage their company on any websites if we would accept the equivalent of one month's payment in return.**

Documents List

Filename

 Installation Agreement ver.[29125].pdf	Download
Solar Titan courtesy letter - signed[35441].pdf	Download

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **06/07/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **40d6e7fd-f1e5-40f8-9d46-9a45b5984bbb**

Completion Date **10/27/2022 10:55:37 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 North Peters Road**

Company City **Knoxville**

Company State **KY**

Company ZIP **42642**

Company Phone [REDACTED]

Company E-Mail [REDACTED]

Was a contract signed? **True**

Date(s) of transaction **12/17/2021**

Product or service involved **Solar Panels & Battery**

Total Price **70752.82**Amount Paid **11800**How did you hear about this product or service? **Youtube/Facebook/TV advertisement**With what other agencies have you filed a complaint? **BBB of Kentucky (case number: [REDACTED])**What action was taken by those agencies? **nothing yet**Have you hired or retained an attorney? **False**Have you started court action? **False**What action will resolve your complaint? **Contract cancellation or system working with no issues for 12 month**Briefly state the facts of your complaint **Solar Panel system hasn't been fully functional pretty much since the installation due to failed components**

Documents List

Filename

[REDACTED] Installation Agreement ver..pdf	Download
loan-closing-[REDACTED].pdf	Download

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature [REDACTED]

Date **10/27/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **e27a6731-50d3-4d07-bd80-3545140f3c61**

Completion Date **9/13/2022 4:02:01 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **SOLAR TITAN USA**

Company Address **414 N Peters Rd,**

Company City **KNOXVILLE**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **MARCH 2021**

Product or service involved **SOLAR PANELS**

Total Price **16000=**

Amount Paid **APPROX 1000**

How did you hear about this product or service? **ADVERTISEMENT**

With what other agencies have you filed a complaint? **SUNLIGHT FINANCIAL**

What action was taken by those agencies? **NONE**

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint? **WOULD LIKE FINANCIAL COMPENSATION FOR MONIES PAID AND REVENUE LOST**

Briefly state the facts of your complaint **CONTRATED IN EARLY 2021 AFTER MULTIPLE DELAYS FINALLY SHOWED UP IN OCT OF 2021 BEGAN PAYING ON LOAN IMMEDIATELY BUT INSTALL WAS NOT COMPLETE TILL JULY 2022 CAUSING LOSS OF INCOME AND PAYMENTS WHEN CONTRACT SAID PAYMENTS BEGAN 90 AFTER INSTALL**

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature

Date **09/13/22**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**

Lawson, Jennifer (KYOAG)

From: Dupre, Austin I (KYOAG)
Sent: Friday, July 8, 2022 9:42 AM
To: Lawson, Jennifer (KYOAG)
Subject: Fw: AGDC1 From Website

Another one about Solar Titan.



Austin Dupré
Constituent Services
Office of the Attorney General
700 Capitol Ave.
Frankfort, KY 40601
502-696-5631
Austin.Dupre@ky.gov

From: no_reply@kentucky.gov <no_reply@kentucky.gov>
Sent: Thursday, June 16, 2022 5:31 PM
To: Attorney General (KYOAG) <Attorney.General@ky.gov>
Subject: AGDC1 From Website

Prefix: Mrs.
Name: [REDACTED]
Email Address: [REDACTED]
Reason for Contacting: Solar Titan
Address Line 1: [REDACTED]
Address Line 2: [REDACTED]
City: [REDACTED]
State: [REDACTED]
Zip Code: [REDACTED]
County:
Country:
Phone: [REDACTED]

Message: I signed an agreement in October for solar system they said it would run my hole house I told them that other company had said it would not run my heating unit. Solar Titan salesman Laughed and theirs would, when they finally came to hook up the electric to the breaker box they asked what 4 breakers did I want to hook up I said 4 breakers they said it would run my house when electric goes out. No only 5 breakers no heating unit at all. I picked 4 breakers when they hooked them up the breakers didn't work I waited 2 weeks for them to come back and fix that when they did it blew my microwave. I have to get a new one I still don't have it hooked up and running yet. And the finance company wasn't supposed to start payments until it was completed they made me start in January paying. I don't see how this is lawful to its a scam. I would love to get my money back and everything gone out of my property

User Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 15_5 like Mac OS X) AppleWebKit/605.1.15 (KHTML, like Gecko) Mobile/19F77

[FBAN/FBIOs;FBDV/iPhone13,2;FBMD/iPhone;FBSN/iOS;FBSV/15.5;FBSS/3;FBID/phone;FBLC/en_US;FBOP/5]

Page: <https://ag.ky.gov/Contact-Us/Pages/default.aspx>



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **d34150f2-54b6-4c50-ac8b-82993b4dd23a**

Completion Date **6/17/2022 11:43:51 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titen USA**

Company Address **414 North Peters road**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone

Company E-Mail

Was a contract signed? **False**

Date(s) of transaction **2/2022**

Product or service involved **Solar system**

Total Price **56,000.00**

Amount Paid

How did you hear about this product or service?

With what other agencies have you filed a complaint?

What action was taken by those agencies?

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint?

Briefly state the facts of your complaint **Failure to complete system Dishonesty Poor customer service**

Document Upload

Electronic Signature

I Acknowledge **False**

Electronic Signature



Date **6/17/22**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **e11bbfae-2267-44f0-bb61-669eb25758fd**

Completion Date **6/16/2022 10:30:34 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan**

Company Address **414 N Peters Rd**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **09/17/2021**

Product or service involved **Solar Panels with full install and hook up**

Total Price **43,000**Amount Paid **\$43,000**How did you hear about this product or service? **Google search**With what other agencies have you filed a complaint? **None**What action was taken by those agencies? **N/A**Have you hired or retained an attorney? **False**Have you started court action? **False**What action will resolve your complaint? **Communication, complete failed inspection corrections, complete hook up for emergency power backup.**

Briefly state the facts of your complaint **Please understand this is lengthy and will exceed 1000 characters; Solar Titan occasionally answers their phones and so far has not taken the appropriate action to complete their promises. The system inspection failed 3 times; with a licensed electrician came out one; who'd subsequently quit or was dismissed. Titan was offered an alternative licensed electrician of which they have not completed paperwork on their end. Repeated calls and messages go unanswered and/or unreturned.**

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **06/16/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

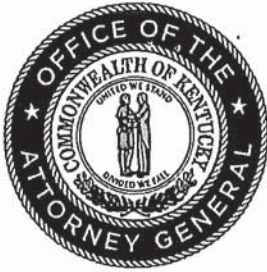
HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **ed6bc648-0b91-48a7-8f95-fa7b7999cbdb**

Completion Date **12/20/2021 5:45:00 PM**

Consumer Complaint and Mediation Form

Name

Address

City

State

ZIP/Postal Code

County

Home Phone

Mobile Number

E-Mail

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 N Peters Rd, Knoxville, TN 37922**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail **salesforce@solar titanusa.com**

Was a contract signed? **True**

Date of transaction **October 15, 2021**

Product or service involved **Solar Panels**

12/21/21, 8:43 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

Total Price 54,000

Amount Paid loan payment is \$278.90 per month

How did you hear about this product or service? Referred by a family member

With what other agencies have you filed a complaint? Better Business Beureau

What action was taken by those agencies? None yet

Have you hired or retained an attorney? False

Have you started court action? False

What action will resolve your complaint? I want the contract cancelled and the panels removed. I want my roof restored to it's previous condition.

Briefly state the facts of your complaint Solar panel loan was supposed to replace the electric bill, and the battery is supposed to charge during the day and power the house at night, but doesn't charge or discharge below 41 degrees. The installers told me that during a power outage, it turns off so there's no electricity flowing back into the grid to electrocute a lineman. You'll have what's in the battery, but when that's out, you're without power." When I called and spoke to the engineer and said I wanted to cancel the contract, he said "We don't do that. You'll get charged for it whether you go forward with the install or not." The electrical part was hooked up Nov 19 2021 but they have still not called to have it inspected but they reported this as complete, so I am now being charged for it. They refuse to return phone calls. Others have the same problem with this company.

Documents List

Filename

[REDACTED] nstallation Agreement ver..pdf

Download

Document Upload

Electronic Signature

I Acknowledge True

Electronic Signature [REDACTED]

Date 12/20/2021

Authorization to Release Information

Name of Company/Agency Authorized to Release Information Mosaic loan servicing

Account/Loan Number [REDACTED]

Email Address loanservicing@joinmosaic.com

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **244c17b1-81e2-4e63-a929-bd743c17e5ea**

Completion Date **4/20/2022 2:07:43 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan/Ideal Horizons**

Company Address **414 N Peters Rd, Knoxville, TN 37922**

Company City **Frankfort**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **10/22/2021**

Product or service involved **Yes**

Total Price **40,000**Amount Paid **1000**How did you hear about this product or service? **Ads, solar company searches.**With what other agencies have you filed a complaint? **BBB**What action was taken by those agencies? **Complaint was closed as Unresolved. BBB has now suspended their accreditation**Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **Removal of their property, repair damages from said removal and exiting of the contract and loan free and clear. Not letting anyone else become a victim to their scam. They quickly add panels to home and immediately tell the lending company Mosaic that their product and up and running to which consumer starts making payments within 1-2 months**

Briefly state the facts of your complaint **Signed contract in 10/2021 to add solar to the home to reduce energy costs. Panels installed 11/2021, 12/2021 electrician adds other connectors to panels and a battery pack etc, but not connected to the home yet. Started making payments on loan with Mosaic...Jan, Feb, Mar, and April. Made complaint to BBB that they weren't calling us back in Feb because we were still waiting for calls back weekly in Jan and Feb to know when next appointment would be. Case was left unresolved because they did not reply. Then they called to discuss reimbursement of loan payments but DocuSign suggested bribery and rolling over payments. Did get a check for the 3 months of payments. Now end of April still no working product and made another payment this month and one upcoming in early May. No one calls back to schedule or confirm or to update you. Very scared we will be making payments on product that will never work for years to come. It's already been 6 months and services still not completed.**

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **04/20/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

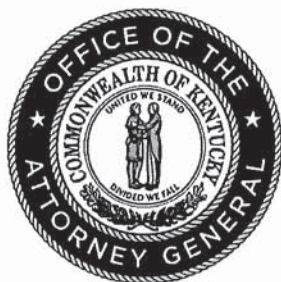
HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **c73a5a02-35a5-4a01-970e-2317f7187448**

Completion Date **4/13/2022 11:33:52 AM**

Information

Consumer

First Name [REDACTED]

Last Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

Zip Code [REDACTED]

County [REDACTED]

Phone Number [REDACTED]

Email Address [REDACTED]

What is your age? **26-39**

Are you a Veteran? **No**

How You Were Scammed

Phone Number of Caller

Was it an automated call?

Were you provided a call back number?

If yes, please provide the phone number

Website Address (if known)

Email Address of Sender

Address of Sender

Description or Name of Scammer, if known: **Solar Titan**Location Where Scam Occurred: **In my home**

Type of Scam

Please Select **Other**

If the scam you experienced is not listed above, please select "other" and briefly explain **I got solar panels from Solar Titan, I applied and got approved for a loan through Spectrum Credit Union. I paid \$185 for the first payment. It is on my credit score.**

Did you lose money? **Yes**If so, how much? **27000**How did you send the money? **through Spectrum credit union Loan**

Further Information

Please briefly describe your situation involving the scam or potential identity theft. You may also attach any copies of documents you received or copies of receipts you may have. **They sent out unlicensed electricians to my house to rewire the things I wanted to the solar panels. They also installed the battery on the outside of the house knowing they needed to be inside due colder temperatures. Then tried to get the actually licensed electrician to pass them anyways.**

Do you have attachments you would like to provide electronically now? This can include receipts, email correspondence, photos or screenshots of cell phone contacts, etc.

Type of ID Theft

Do you believe your identity or medical information may have been compromised? **No**Were you contacted by a company or agency regarding a data breach? **No**

If yes, who contacted you?

Was your identity used to open new accounts, etc.? **No**

If other, please explain

What To Do Next?

Signature

Electronic Signature

Date **04/13/2022**Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **818257bb-55dd-4782-973d-00be27d8c2af**

Completion Date **10/26/2021 10:41:04 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan**

Company Address **2333 Alexandria Drive**

Company City **Lexington**

Company State **KY**

Company ZIP **40504**

Company Phone **865-392-1036**

Company E-Mail [REDACTED]

Was a contract signed? **True**

Date(s) of transaction **6/19/21**

Product or Service [REDACTED] **Case 3:23-cv-00046-DCLC-JEM Document 67-4 Filed 02/23/23 Page 24 of 82 Page ID #: 3228**

Total Price **36000.00**Amount Paid **433.00**How did you hear about this product or service? **Advertising**With what other agencies have you filed a complaint? **Solar Titan, Mosaic (loan services)**What action was taken by those agencies? **So far they have taken no action from my complaint other than pass me from one phone number to another. Complaint filed September 23 2021.**Have you hired or retained an attorney? **False**Have you started court action? **False**What action will resolve your complaint? **Remove the solar panels and cancel my loan. Mosaic has agreed to refund my money 100% as long as Solar Titan approves the return.**

Briefly state the facts of your complaint **I was sold as system that would produce 8000 kw a month. Based on my monthly usage of 2650 kw. The gentleman stated that I should get 85% return using the placement on my roof. After discovering my system wasn't working per the calculation I called Solar Titan. They tell me only 14 of my 20 panels are working and my system output is 8000 kw yearly. This is when I discovered the system was falsely presented at the time of sale. My Daughter purchased the same system under the same sales presentation and has the same issue.**

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **10/26/2021**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**

CONSUMER COMPLAINT FORM

JACK CONWAY
ATTORNEY GENERAL



RETURN TO:
Office of Attorney General
Consumer Protection Division
310 Whittington Parkway, Suite 101
Louisville, KY 40222
Phone: (502) 429-7134
Fax: (502) 429-7129
Hotline: (888) 432-9257
www.eg.ky.gov/cp

TYPE OR PRINT NEATLY. SUBMIT TWO COPIES OF THE COMPLAINT AND TWO COPIES OF ANY DOCUMENTS SUBMITTED.

YOUR NAME ☒ Mr. ☐ Mrs. ☐ Ms. [REDACTED]
ADDRESS [REDACTED]
CITY [REDACTED] STATE [REDACTED] ZIP CODE [REDACTED] COUNTY [REDACTED]
HOME PHONE [REDACTED] WORK/CELL PHONE [REDACTED]
EMAIL ADDRESS: [REDACTED]

COMPANY OR PERSON(S) YOUR COMPLAINT IS AGAINST Solar Mosaic INC.
ADDRESS 601 12th ST, Suite 325
CITY OAKLAND STATE CA ZIP CODE 94607
PHONE: 510-746-8602

Please fill in this section completely.

WAS A CONTRACT SIGNED? ☒ YES ☐ NO (If Yes, Please Attach a Copy of Your Contract.)

WHERE WAS CONTRACT SIGNED? ☐ IN YOUR HOME ☐ AT THE BUSINESS ☒ OTHER Nowhere

DATE(S) OF TRANSACTION 03/22/2021 PRODUCT OR SERVICE INVOLVED Solar Panels

TOTAL PRICE \$30,000 AMOUNT PAID \$361¹⁸ WAS PRODUCT/SERVICE ADVERTISED? ☐ YES ☐ NO

HOW WAS SERVICE ADVERTISED? ☐ Newspaper ☐ TV ☐ Radio ☐ Mail ☐ Phone ☐ Email ☒ Internet ☐ Other

WITH WHAT OTHER AGENCIES HAVE YOU FILED THIS COMPLAINT? _____

WHAT ACTION WAS TAKEN? _____

HAVE YOU HIRED OR RETAINED A PRIVATE ATTORNEY? ☐ YES ☒ NO HAVE YOU STARTED COURT ACTION? ☐ YES ☒ NO

WHAT ACTION WILL RESOLVE YOUR COMPLAINT? _____

Below, briefly state the facts of your complaint (if necessary, use additional paper). Please attach copies of any papers involved (order blanks, warranties, credit card receipts or statements, contracts, advertisements, canceled checks, etc.). The information you provide will be used in our effort to resolve your problem and may be shared with the party against which you have complained. It may also be used to enforce applicable state laws. Under Kentucky's Open Records Act, this complaint will be available for public view upon request. Certain personal information such as account numbers are not subject to the Open Records Act.

If Your Complaint is Regarding a Health Club Membership, Also Complete this Section.

WAS CONTRACT SIGNED? ☐ YES ☐ NO DATE OF CONTRACT _____ LENGTH OF CONTRACT: YEARS _____ MONTHS _____

TIME LEFT BEFORE CONTRACT EXPIRES: YEARS _____ MONTHS _____

TOTAL AMOUNT OF YOUR CONTRACT: \$ _____ AMOUNT PAID TO DATE: \$ _____

HOW WERE YOUR PAYMENTS TO BE MADE? ☐ MONTHLY ☐ YEARLY ☐ OTHER

AMOUNT OF EACH PAYMENT? \$ _____ WHEN WAS YOUR LAST PAYMENT? _____

HAVE YOU MADE PAYMENTS TO ANY COMPANY OTHER THAN THIS HEALTH CLUB? ☐ YES ☐ NO

If yes, please provide the following information:

NAME: _____

ADDRESS: _____

CITY, STATE, ZIP: _____

The above information is true and accurate to the best of my knowledge.

TODAY'S DATE 03/03/22 YOUR SIGNATURE _____

OPTIONAL- COMPLETION OF THIS SECTION IS VOLUNTARY

AGE OF THE PERSON INVOLVED IN THE TRANSACTION: ☐ 0-15 ☐ 16-25 ☐ 26-39 ☐ 40-59 ☐ 60-75 ☐ 76-over

The Office of the Attorney General does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of service and provides, upon request, reasonable accommodations including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities.



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **97e9a3b2-7533-44a8-b12b-1437c0ccda00**

Completion Date **10/28/2022 3:36:18 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **11205 Outlet Dr**

Company City **Knoxville**

Company State **TN**

Company ZIP **37932**

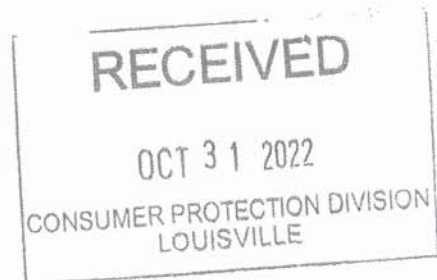
Company Phone **865-392-1036**

Company E-Mail **Solartitanusa.com**

Was a contract signed? **True**

Date(s) of transaction **2-7-22**

Product or service involved **Solar Panels**





ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **9fe7e67b-ec48-4c29-bf1a-009956edfacd**

Completion Date **7/6/2022 1:17:33 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 North Peters Road**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail [REDACTED]

Was a contract signed? **True**

Date(s) of transaction **1/14/22**

Product or service involved **solar panel system**

Total Price **28500**Amount Paid **495**How did you hear about this product or service? **online ad**With what other agencies have you filed a complaint? **BBB**What action was taken by those agencies? **undetermined**Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **Our time being worth something...right after we signed the papers they ran a promotion that included a free battery with every install. We would love to get a free battery that for a time they were including with every install. If that is not feasible then a discount on what we owe.**

Briefly state the facts of your complaint **End of January we signed the contract for solar panel installation. Panels were up within weeks, a month later we get a call from a guy that needed to crawl around in our attic for a structural assessment. We straight out asked, shouldn't this have been done before the panels got installed. We were told yes, but were told they were backlogged and this was the soonest they could get to us. This work needed to get done before a permit got issued. It took seven weeks to get the results back, we just got this work done June 1st. We came to find out that some customers have been waiting over a year to get there panels activated. The panels were wired in the day after the guy initially crawled around in our attic taking measurements. To date no permit has been issued, I inquired about the work being done without a permit and they said its a common practice. Our entire system has been wired and ready to go for 5 months and we can't use it.**

Documents List

Filename

img20220705_13285172.pdf

Download

loan-agreement-388044.pdf

Download

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature

Date **June 24 2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

CONSUMER MEDIATION REQUEST FORM

RECEIVED

DANIEL CAMERON
ATTORNEY GENERAL



JAN 09 2023

CONSUMER PROTECTION DIVISION
LOUISVILLE

310 Whittington Parkway, Suite 101 • Louisville, KY 40222

Hotline: 1-888-432-9257 • Phone: 502-429-7134

FAX: 502-429-7129 • www.ag.ky.gov

RETURN TO:

Office of the Attorney General

Office of Consumer Protection

TYPE OR PRINT NEATLY. SUBMIT TWO COPIES OF THE COMPLAINT AND TWO COPIES OF ANY DOCUMENTS SUBMITTED.

Name ☐ Mr ☐ Mrs ☒ Ms

Address

City

State

Zip Code

County

Home phone

Work/Cell Phone

Email Address

PLEASE NOTE WE ARE UNABLE TO OFFER MEDIATION SERVICES WITHOUT COMPLETE INFORMATION IN THIS SECTION.

Company your complaint is against? SOLAR TITAN

Address 414 N. PETERS RD

City KNOXVILLE

State TN

Zip 27922

County ??

Phone 865 392 1036

Please fill in this section completely.

Was a contract signed? ☐ YES ☒ NO (If yes, please attach a copy of your contract)

Where was the contract signed? ☐ In your home ☐ At the business ☐ Other

Date(s) of transactions Product/Service Involved

Total Price \$ 38,250.00 Amount Paid \$ 13,272.04 Was product/service advertised ☐ YES ☒ NO

How was service advertised? ☐ Newspaper ☐ TV ☐ Radio ☐ Mail ☐ Phone ☐ Email ☐ Internet ☒ Other

With what other agencies have you filed this complaint? MODAIC (THE LOAN COMPANY)

What action was taken? THEY STARTED AN INVESTIGATION

Have you hired or retained a private attorney? ☐ YES ☒ NO

Have you started court action? ☐ YES ☒ NO

If you have retained a private attorney or this matter is pending before or has been decided in the courts, our office will be unable to offer mediation services.

What action will resolve your complaint? I JUST WANT SOLAR TITAN TO COMPLETE THE SOLAR PANEL INSTALLATION

In November of 2021 I agreed to let Solar Titan install solar panels on my house at 402 W. Kingston Ave, Louisville, Ky, 40214. There was no contract with them but I filled out a 27-page contract with Mosaic for a loan for \$38,250.00, on which I have paid \$15,483.84.

Solar Titan said they would take 6 months to finish the project and they installed the panels and the back up battery in December of 2021. However, after that the actions were sketchy and I had to call them frequently to get them to move on to the next stage. During this time I learned that Solar Titan had had several complaints and could no longer operate in Kentucky, but they could finish the projects that they had started. As of December 2022, the only task left was to run an underground wire from the house to the panels on the garage. And hook up the panels. I called to check on the status of that stage and was told that they would schedule it for after the holidays. I tried calling on January 3 and, no matter what options I chose, I heard the phone pick up, a voice saying "goodbye" and then the phone clicked off.

I called Mosaic (855-746-7849) to inform them that I did not want to continue paying for a service I did not receive and they said they would begin an investigation—case number [REDACTED]

I just want the project completed.

Below, briefly state the facts of your complaint (if necessary, use additional paper). Please attach copies of any papers involved (order blanks, warranties, credit card receipts or statements, contracts, advertisements, canceled checks, etc.). The information you provide will be used in our effort to resolve your problem and may be shared with the party against which you have complained. It may also be used to enforce applicable state laws. Under Kentucky's Open Records Act, this complaint will be available for public view upon request. Certain personal information such as account numbers are not subject to the Open Records Act.

SEE ATTACHED SHEETS

I authorize that the information submitted on this consumer mediation complaint form is true and accurate to the best of my knowledge.

Signature

Date

1-5-23

AUTHORIZATION TO RELEASE INFORMATION

Please complete this section only if your complaint involves a financial institutions, mortgage/loan concerns, a debt collector, a medical provider or other issues that require a third party authorization. This is a voluntary release of information and is not required to file a mediation complaint, however in order for the business entity to disclose personal information with our office a release is needed.

The undersigned has submitted a consumer complaint and is currently working with the Kentucky Office of the Attorney General through the mediation process and hereby authorizes the company listed below (and its employees) to speak with and discuss my account/loan/mortgage on my behalf with the Kentucky Office of the Attorney General. The parties listed are each authorized to share with the other any and all information concerning my account, including but not limited to, financial information, without further authorization and until this matter is closed by the Office of the Attorney General or the Authorization is revoked.

Name of Company/Agency Authorized to Release Information MOZAIC

Account/Loan Number

Email address SUPPORT@JOINMOZAIC.COM

HIPAA Privacy Authorization - Authorization for Use or Disclosure of Protected Health Information

I authorize _____ (healthcare provider) to use and disclose my protected health information to the Office of the Attorney General for use in my consumer mediation complaint.

Signature

Date

1-5-23

OPTIONAL - COMPLETION OF THIS SECTION IS VOLUNTARY

AGE OF THE PERSON INVOLVED IN THE TRANSACTION: ☐ 0-15 ☐ 16-25 ☐ 26-39 ☐ 40-59 ☐ 60-75 ☒ 76-over

The Office of the Attorney General does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of service and provides, upon request, reasonable accommodations including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities.



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **e75ae642-80f8-4829-96d2-cb1cc9951e2f**

Completion Date **7/13/2022 8:52:16 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 N Peters Rd**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail [REDACTED]

Was a contract signed? **True**

Date(s) of transaction [REDACTED]

Product or service involved **Solar Panels**

Total Price **52,000**

Amount Paid

How did you hear about this product or service? **Saw an online ad**

With what other agencies have you filed a complaint?

What action was taken by those agencies?

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint?

Briefly state the facts of your complaint **The salesman came to our house in October and sold us an 8KW solar system. The panels and outdoor equipment were installed quickly that month. When I kept calling to get the inspection done they said they were waiting on the permits to be pulled, so they installed the system without getting the permits first. Finally got the permits and they started inspections which failed twice. Every time I tried to call they never answered or took weeks to get back with a response. Finally passed inspection and now there are issues with the products and they aren't working at full capacity. They are not sending people out to fix their product that isn't working and are now relying on outside companies to fix their issues. I was told today that a different company would be fixing the PV links. Solar Titan promises big savings. They do all of their work without pulling proper permits first and then don't keep their products working.**

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature

Date **07-13-2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

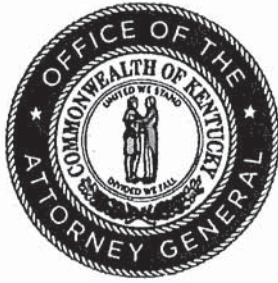
HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **3de9418f-0329-436a-b58a-afe31c2abd69**

Completion Date **8/18/2022 9:08:22 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **11205 Outlet Drive**

Company City **Knoxville**

Company State **TN**

Company ZIP **37932**

Company Phone **865-392-1036**

Company E-Mail **Salesforce@soltartitanusa.com**

Was a contract signed? **True**

Date(s) of transaction **December 21, 2021**

Product or service involved **Solar panel installation**



Total Price **\$38,000.00**Amount Paid **\$38,000.00**How did you hear about this product or service? **Internet**With what other agencies have you filed a complaint? **Mosaic Finance Company**What action was taken by those agencies? **Mosaic stated the complaint closed-issue was resolved,**Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **Complete installation; continued reimbursement of payments made to our electric co [REDACTED] until project is complete. Upgrade 100amps panel box to 200amps. Box was not checked before install panels on roof. Correct solar panel's wiring, which should have conduit covering for protection against fire. Contact LG&E, There are no notes on my [REDACTED] account, that have been contacted by Solar Titan USA**

Briefly state the facts of your complaint **My wife and I signed contract on 12/21/2021, this is now 8/18/2022. On 12/30/21 their crew installed solar panels on roof, finished on 12/31/21, New Year's Eve, Only 9 days after contract was signed, without checking panel box. I don't know if they had received a permit that fast. Contract only stated we was responsible for tree removal. When there electrician came, did line tap, stated we needed upgraded box. We contacted Solar Titan and they stated they would replace box. We waited for weeks, before calling back, they stated that their electrician had quit and had to find another one. We had to contact them again, they stated they had contacted a electrician in Kentucky, he came, we signed a release for him to install box. He never came to do the job. His name was [REDACTED]**

Documents List

Filename

77A8C3FD-08ED-4E22-841A-7C86AA99CF91.png	Download
573B5135-FA38-449A-93A6-FFE23051093C.jpeg	Download
68B14833-A13B-47AB-A562-97D5838FD672.jpeg	Download
BBEF1ACD-89F3-4769-AF27-F9550A5911BE.jpeg	Download
89591348-6C5E-4748-85B1-C4366EF1B68B.jpeg	Download
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Filename

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C21F65F6-C12A-4964-A3C4-703BFF09986C.png	Download

Document Upload

Electronic SignatureI Acknowledge **True**Electronic Signature Date **August 18, 2022****Authorization to Release Information**

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

8/19/22, 8:41 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

Date

Verification **PASS**

Lawson, Jennifer (KYOAG)

From: Office of Attorney General Daniel Cameron <support@kentucky-attorneygeneral.zendesk.com>
Sent: Wednesday, October 26, 2022 10:35 AM
To: Lawson, Jennifer (KYOAG)
Subject: OSP

Please see the attached.

Thank you,
Austin Dupre

From [REDACTED]

Date: Tue, Oct 25, 2022 at 6:53 pm

I am another client that signed up to get a solar panel system through Solar Titan and have the had the panels for five months but no solar power yet. I would like to be added to your list of complaints against Solar Titan. I reported the to the BBB yesterday.

Prefix: Dr.

FirstName: [REDACTED]

MiddleName: [REDACTED]

LastName: [REDACTED]

Address1: [REDACTED]

Address2: [REDACTED]

City: [REDACTED]

State: [REDACTED]

ZipCode: [REDACTED]

County:

PhoneNumber: [REDACTED]

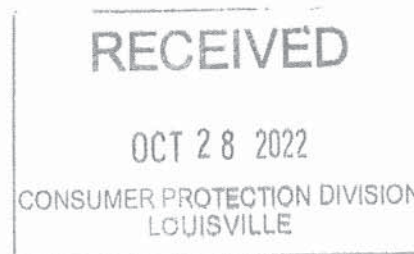
EmailAddress: [REDACTED]

Type: (assign form)

Name: IP Address

Value: [REDACTED]

Subject: Solar Titan Client.



2C



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **310187b0-4a29-4212-882a-d812856baacd**

Completion Date **9/7/2022 11:32:12 AM**

Information

Consumer

First Name [REDACTED]

Last Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

Zip Code [REDACTED]

County [REDACTED]

Phone Number [REDACTED]

Email Address [REDACTED]

What is your age? **60+**

Are you a Veteran? **No**

How You Were Scammed

Phone Number of Caller

Was it an automated call?

Were you provided a call back number?

If yes, please provide the phone number

Website Address (if known) [REDACTED]

Email Address of Sender

Name of Sender

Address of Sender

Description or Name of Scammer, if known: **Solar Titan**

Location Where Scam Occurred: **Home**

Type of Scam

Please Select **Other**

If the scam you experienced is not listed above, please select "other" and briefly explain **Sales technician lied about every aspect of solar panels abilities**

Did you lose money? **Yes**

If so, how much? **18,000 plus interest**

How did you send the money? **Monthly loan payments.**

Further Information

Please briefly describe your situation involving the scam or potential identity theft . You may also attach any copies of documents you received or copies of receipts you may have. **Our solar system was supposed to cover our utility bill. It covers about 40%. Now they want more money to bring us up to 90%. We were scammed.**

Do you have attachments you would like to provide electronically now? This can include receipts, email correspondence, photos or screenshots of cell phone contacts, etc.

Type of ID Theft

Do you believe your identity or medical information may have been compromised?

Were you contacted by a company or agency regarding a data breach?

If yes, who contacted you?

Was your identity used to open new accounts, etc.?

If other, please explain

What To Do Next?

Signature

Electronic Signature



Date **9/7/2022**

Verification

Lawson, Jennifer (KYOAG)

From: Dupre, Austin I (KYOAG)
Sent: Wednesday, July 20, 2022 11:12 AM
To: Lawson, Jennifer (KYOAG)
Subject: Fw: AGDC1 From Website

Another Solar Titan issue.



Austin Dupré
Constituent Services
Office of the Attorney General
700 Capitol Ave.
Frankfort, KY 40601
502-696-5631
Austin.Dupre@ky.gov

From: no_reply@kentucky.gov <no_reply@kentucky.gov>
Sent: Wednesday, July 20, 2022 8:45 AM
To: Attorney General (KYOAG) <Attorney.General@ky.gov>
Subject: AGDC1 From Website

Prefix: Mr.

Name: [REDACTED]

Email Address: [REDACTED]

Reason for Contacting: Solar Titan

Address Line 1: [REDACTED]

Address Line 2: [REDACTED]

City: [REDACTED]

State: [REDACTED]

Zip Code: [REDACTED]

County: [REDACTED]

Country: [REDACTED]

Phone: [REDACTED]

Message: We signed a contract with Solar Titan in April for solar installation for our home and they have not finished the installation, today is July 20,2022

User Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 15_5 like Mac OS X) AppleWebKit/605.1.15 (KHTML, like Gecko) GSA/219.0.457350353 Mobile/15E148 Safari/604.1

Page: <https://ag.ky.gov/Contact-Us/Pages/default.aspx>



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **ede05c88-bf5c-42b0-b998-2ed714199896**

Completion Date **6/22/2022 9:32:13 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 Peters rd**

Company City **Knoxville**

Company State **KY**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail **Stephaniejones@solartitanusa.com**

Was a contract signed? **True**

Date(s) of transaction **January 10, 2021**

Product or service involved **Turn key solar system**

Total Price **54,500**Amount Paid **600**How did you hear about this product or service? **Google research**With what other agencies have you filed a complaint? **None**What action was taken by those agencies? **NA**Have you hired or retained an attorney? **False**Have you started court action? **False**What action will resolve your complaint? **Complete all permitting and hookup of system. Repair damage to existing system.**

Briefly state the facts of your complaint **Company installed solar panels, battery system and inverter without obtaining proper electrical permits which has resulted in electrical arc flash with existing wiring. Over the past six months, I have weekly called for status and received the same response that it will be soon. Multiple circuits failed as a result of arc flash. I hired an electrician to troubleshoot the problem and he discovered the arc flash on June 20, 2022. I contacted Solar Titan Operations Manager Dale Roden 859-606-0561 who advised me the warranty may be void if we touch the product and it was my electrical system that damaged the circuits (no regard for safety of my family of 6).**

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **June 22, 2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission ID **ccf90426-ba56-4db2-aed0-099fd29c06fe**

Completion Date **9/16/2022 9:04:20 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 N Peter's Rd**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **1/31/22**

Product or service involved **Solar panels**

Total Price **42,050**

Amount Paid

How did you hear about this product or service? **TV advertising**

With what other agencies have you filed a complaint?

What action was taken by those agencies?

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint?

Briefly state the facts of your complaint **We signed up for solar panels back at the end of January. Brittany Marcum came into our house and told us how great and amazing Solar Titan USA was and that they had been really good at getting panels up and running. It's now September and my solar panels still are not functioning.**

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature



Date **09/16/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

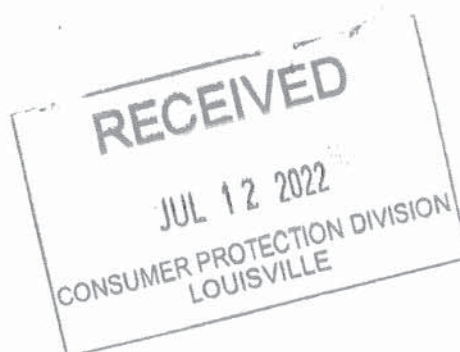
Verification **PASS**

Lawson, Jennifer (KYOAG)

From: Dupre, Austin I (KYOAG)
Sent: Tuesday, July 12, 2022 11:36 AM
To: Lawson, Jennifer (KYOAG)
Subject: Fw: AGDC1 From Website



Austin Dupré
Constituent Services
Office of the Attorney General
700 Capitol Ave.
Frankfort, KY 40601
502-696-5631
Austin.Dupre@ky.gov



From: no_reply@kentucky.gov <no_reply@kentucky.gov>
Sent: Tuesday, July 12, 2022 11:16 AM
To: Attorney General (KYOAG) <Attorney.General@ky.gov>
Subject: AGDC1 From Website

Prefix: Mr.
Name: [REDACTED]
Email Address: [REDACTED]
Reason for Contacting: Solar Titan USA
Address Line 1: [REDACTED]
Address Line 2:
City: [REDACTED]
State: [REDACTED]
Zip Code: [REDACTED]
County: [REDACTED]
Country:
Phone: [REDACTED]

Message: I am having issues with this company, performing work for me. They have not pulled any permits with the county and have fail to meet the timelines the promised. I also have called several time to follow up and the tell me they are emailing me forms for assistance on the loan the signed me up for that I never receive. I was told I would not have to make payments till sixty days after install but they claimed The install was done before I hade all the equipment.

User Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/103.0.0.0 Safari/537.36

Page: <https://ag.ky.gov/Contact-Us/Pages/default.aspx>



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **a13d80b4-3d79-4751-b2cb-d2cfe45d81e9**

Completion Date **7/16/2022 1:28:34 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan**

Company Address **414 North Peters Road**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **March 19, 2022**

Product or Service Involved **Case 3:23-cv-00046-DCLC-JEM Document 67-4 Filed 02/23/23 Page 49 of 82 Page #:**



Total Price **\$26,250.00**Amount Paid **\$149.02**How did you hear about this product or service? **Through a friend**With what other agencies have you filed a complaint? **None**

What action was taken by those agencies?

Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **I want the solar panels removed from my roof & for my roof to be fully repaired. I also want my contract voided with Mosaic Loaning company.**

Briefly state the facts of your complaint **I signed up for this service in March and the service has yet to be fully completed. I began paying for the service last month. It's \$149.02 monthly. NO ONE from Solar Titan has given me any concrete answers as to why this is happening. Everytime I call to ask why, they only tell me they're having trouble with contractors. I have to call THEM for answers, but they never reach out to me. This is complete nonsense. Please help in any way you can. Thank you.**

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **July 16, 2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **88938363-0933-4b11-9546-e5d85739fb1b**

Completion Date **2/20/2022 12:53:24 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA aka Ideal Horizons aka Mosaic aka Concord**

Company Address **414 N Peters Rd**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **9/23/2021**

Product or service involved **solar panel loan**

Total Price **27540**Amount Paid **0.00**How did you hear about this product or service? **google**With what other agencies have you filed a complaint? **none, there are several on the BBB already (see documents attached)**What action was taken by those agencies? **unknown**Have you hired or retained an attorney? **True**Have you started court action? **False**

What action will resolve your complaint? **Dissolve/void the solar loan. Restore my credit score. I do not have solar panels, and had canceled solar panels closely to when I "ordered" them.**

Briefly state the facts of your complaint **I signed up for solar panels Sept 2021 and then shortly after had to cancel due to needing to finance for new roof since mine is defective and could not afford both. I called the solar company and they said okay, did not tell me any cancelation policy and said I didn't have to do anything further past the phone call. Later to come find out in January 2022, they did not cancel on their end and their lender is expecting payment. This secondary company has now tried to come after me financially for a product I do not have (they have went to the credit reporting/collections. Solar Titan will not respond and Mosaic will not cancel or corporate. Please see "Order of events" document for full statement and reference to documents given. There are documents that will not load on here (I think I have too many) but I am willing to send them via email. I have sought legal help and have been pointed to your office. I am desperate and really do need help.**

Documents List

Filename

document_A_Installation Agreement ver..pdf	Download
document_C2_solar_text.PNG	Download
document_G_.png	Download
mosaic cancel_initial .png	Download
document_N3_mosaic_mail3.jpg	Download
document_M2_attroney_letter2.jpg	Download
document_L_mosaic_email.png	Download
document_J_loan-closing-cert_12_16_2021.pdf	Download
document_C3_mosaic_email 4.png	Download
document_N2_mosaic_mail2.jpg	Download
document_B1_mosaic_email 2.png	Download
document_B2_mosaic_email 1.png	Download
document_K_mosaic_email 6.png	Download



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id 72a98f56-8b01-4f4f-9640-6b0426283e12

Completion Date 3/15/2022 10:02:25 AM

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? No

Company or person your complaint is against Solar Titan USA

Company Address 414 North Peters Rd.

Company City Knoxville

Company State TN

Company ZIP 37922

Company Phone 888-650-0151

Company E-Mail [REDACTED]

Was a contract signed? True

Date(s) of transaction 8/11/2021

Case 3:23-cv-00046-DCLC-JEM Document 67-4 Filed 02/23/23 Page 53 of 82 Page #:

Product or service involved solar panels

3257

#129.52

1/2

3/16/22, 11:56 AM

<https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin>

Total Price **18,000**

Amount Paid

How did you hear about this product or service? **online and neighbors**

With what other agencies have you filed a complaint? **Better Business Bureau**

What action was taken by those agencies? **None**

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint? **refund of money promised in exchange for electric bills**

Briefly state the facts of your complaint **I signed a contract last August to have solar panels installed on my home. The company installed the panels but have not turned them on. I needed an electrical panel upgrade which took them months to complete (it was completed on March 10, 2022). The company has repeatedly insisted that nothing they promised in the sales meeting was ever guaranteed. They have dodged answers and refuse to send me a copy of my warranty. I have to contact them to find out installation dates and they tried to push it back for months. They promised my payments for the panels would take the place of an electric bill, which has not happened. They have been patronizing and shady. Loan is predatory.**

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature

[REDACTED]

Date **03/15/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information **Mosaic**

Account/Loan Number

[REDACTED]

Email Address

[REDACTED]

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

[REDACTED]

Date **03/15/2022**

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **4813f011-12f1-4f91-b102-54e908aa89c0**

Completion Date **11/15/2022 1:29:29 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 N Peters Rd, Knoxville, TN 37922**

Company City **Corbin**

Company State **TN**

Company ZIP **40701**

Company Phone

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction

Product or service involved **No**

Total Price **Un sure but somewhere around 44000**

Amount Paid

How did you hear about this product or service?

With what other agencies have you filed a complaint? **None**

What action was taken by those agencies?

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint? **For them to come get their stuff and stop the loan. They are very deceptive and have lied to us on several occasions**

Briefly state the facts of your complaint **Solar panels no make electricity bill cheats as they said it would and also want to charge me 3000 dollars to remove panels and put back on so my roof can get fixed when they told me it's would be 400 before I signed to buy them knowing I needed a new roof when I had the money**

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature



Date **11-15-2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **f48a0a17-9396-4668-b879-bb82a35a7569**

Completion Date **6/13/2022 10:37:31 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 North Peters Road**

Company City **Knoxville**

Company State **KY**

Company ZIP **40152**

Company Phone **865-392-1036**

Company E-Mail [REDACTED]

Was a contract signed? **True**

Date(s) of transaction **3/20/22**

Product or service involved **Solar System with Battery Back up**

Total Price **43,750**

Amount Paid **0 it is a 20 year loan, First Payment due this month**

How did you hear about this product or service? **facebook**

With what other agencies have you filed a complaint? **BBB Bad Review**

What action was taken by those agencies? **none**

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint? **Complete the system install or let me out of the contract**

Briefly state the facts of your complaint **Their Sales Person Misled us on everything from all equipment made in the usa to it will power your whole house when a Power failure occurs. They Installed all the Equipment without a Permit from the Local Electrical Inspector and have never come back to turn it on or request the Inspection. I have been calling weekly with nothing but excuses. They have been paid in Full by their Finance Company so they have no incentive to come back, There is actually a Facebook group of over 160 people that are in the same situation I'm in. It should be Breach of Contract**

Documents List

Filename

Solar loan.pdf

Download

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature

Date **6/13/22**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information **Solar Titan USA**

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**

Search



ATTORNEY GENERAL

DANIEL CAMERON

Secure Online System

Application Information

[BACK TO SEARCH RESULTS](#)

[PRINT](#)

Submission Id **e7e9ff0c-4263-41e6-afc8-76c43ca012c8**

Completion Date **6/26/2022 3:10:47 PM**

Information

Consumer

First Name [REDACTED]

Last Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

Zip Code [REDACTED]

County [REDACTED]

Phone Number [REDACTED]

Email Address [REDACTED]

What is your age? **60+**

Are you a Veteran? **No**

How You Were Scammed

Phone Number of Caller

Was it an automated call?

Were you provided a call back number?

If yes, please provide the phone number

Website Address (if known)

Email Address of Sender

Name of Sender

Address of Sender

Description or Name of Scammer, if known: **Solar pannels**

Location Where Scam Occurred: **My home**

Type of Scam

Please Select **Other**

If the scam you experienced is not listed above, please select "other" and briefly explain **Solar pannels**

Did you lose money? **Yes**

If so, how much? **60000**

How did you send the money? **Loan**

Further Information

Please briefly describe your situation involving the scam or potential identity theft . You may also attach any copies of documents you received or copies of receipts you may have.

Documents List

Filename	
20220622_140345.jpg	Download
20220622_140345.jpg	Download
20220622_140355.jpg	Download
20220622_140402.jpg	Download

Do you have attachments you would like to provide electronically now? This can include receipts, email correspondence, photos or screenshots of cell phone contacts, etc.

Type of ID Theft

Do you believe your identity or medical information may have been compromised?

Were you contacted by a company or agency regarding a data breach?

If yes, who contacted you?

Was your identity used to open new accounts, etc.?

If other, please explain

What To Do Next?

Signature

Electronic Signature



Date **06/26/2022**

Verification **PASS**

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[Policies](#) [Security](#) [Disclaimer](#) [Accessibility](#)

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Kentucky.gov



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **fd1cc03a-06b4-4e86-be61-f64342ee0510**

Completion Date **1/30/2023 11:32:57 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA (Ideal Horizon Benefits LLC, of TN)**

Company Address **414 North Peters Road**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail **??**

Was a contract signed? **True**

Date(s) of transaction **05/04/2021**

Product or service involved **Solar panel installation and financing**

Total Price **\$59,500.00 plus interest**

Amount Paid **~ \$7,000.00 paid on loan for total amount**

How did you hear about this product or service? **neighbor**

With what other agencies have you filed a complaint? **--**

What action was taken by those agencies? **--**

Have you hired or retained an attorney? **True**

Have you started court action? **False**

What action will resolve your complaint? **First, cancellation of the loan for this underperforming product, sold to me under misrepresentation. Then perhaps removal of the panels from my house. Finally, damages for emotional distress, plus attorney fees, based on the misrepresentation perpetrated.**

Briefly state the facts of your complaint **This is [REDACTED] Esq., writing on behalf of my client, [REDACTED] (contact on attachment, feel free to reach out). I understand that he has already made a complaint for your file, detailing the coerced transaction. I am writing to add detail as to the burden this has caused him: His Wife recently suffered a stroke, taking her hearing and eyesight, and she may not survive this illness. He has to travel to her facility to feed her. In the midst of this, Solar Titan monthly loan payments have jumped over \$100.00, raising the possibility that the Higginbothams might have to leave their house of 20 years (paid off a few months ago).**

Documents List

Filename

[REDACTED]tr solar titan 01132023.pdf

Download

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature [REDACTED]

Date **01/30/2023**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

cc



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **b6f27857-e4f0-42b9-b1c5-56f63f9c2d56**Completion Date **12/7/2022 8:24:24 AM**

Information

Consumer

First Name [REDACTED]

Last Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

Zip Code [REDACTED]

County [REDACTED]

Phone Number [REDACTED]

Email Address [REDACTED]

What is your age? **26-39**Are you a Veteran? **No**

How You Were Scammed

Phone Number of Caller

Was it an automated call? **No**Were you provided a call back number? **No**

If yes, please provide the phone number

Website Address (if known) **5875 OWENTON RD**

Email Address of Sender

Name of Sender

Address of Sender

Description or Name of Scammer, if known: **Solar Titan Usa**Location Where Scam Occurred: **Owenton road stamping ground**

Type of Scam

Please Select **Other**

If the scam you experienced is not listed above, please select "other" and briefly explain

Did you lose money? **Yes**If so, how much? **1500 and growing**How did you send the money? **Withdrawn**

Further Information

Please briefly describe your situation involving the scam or potential identity theft . You may also attach any copies of documents you received or copies of receipts you may have. **Solar Titan USA installed solar panels onto a roof and they still not currently operational and we are being charged for.**

Do you have attachments you would like to provide electronically now? This can include receipts, email correspondence, photos or screenshots of cell phone contacts, etc.

Type of ID Theft

Do you believe your identity or medical information may have been compromised?

Were you contacted by a company or agency regarding a data breach?

If yes, who contacted you?

Was your identity used to open new accounts, etc.?

If other, please explain

What To Do Next?

Signature

Electronic Signature

Date **12/7/2022**Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **ea225008-7789-4f56-9c1e-eca180b67ad2**

Completion Date **11/22/2022 8:32:49 AM**

Information

Consumer

First Name [REDACTED]

Last Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

Zip Code [REDACTED]

County [REDACTED]

Phone Number [REDACTED]

Email Address [REDACTED]

What is your age? **26-39**

Are you a Veteran? **No**

How You Were Scammed

Phone Number of Caller

Was it an automated call?

Were you provided a call back number?

If yes, please provide the phone number

Website Address (if known)

Email Address of Sender

Name of Sender

Address of Sender

Description or Name of Scammer, if known: **Solar Titan USA**

Location Where Scam Occurred: **Home location**

Type of Scam

Please Select **Investment**

If the scam you experienced is not listed above, please select "other" and briefly explain

Did you lose money? **Yes**

If so, how much? **43,000**

How did you send the money? **Bring paid monthly**

Further Information

Please briefly describe your situation involving the scam or potential identity theft. You may also attach any copies of documents you received or copies of receipts you may have. **Purchased a solar system from solar titan USA / new horizon benefits . The system hasn't functioned right since install in Oct. 2021, made several claims about the system not working and they came out and supposedly fixed the system in June, they didn't fix the system but they did show up. Now the system is still not working and they have made no attempt to fix the system after several complaints over the last few months, I either get told we will get right on it , we don't have any parts for your system or they hang up on me. I've been paying on this thing for over a year and it doesn't work and nothing is being done about it**

Do you have attachments you would like to provide electronically now? This can include receipts, email correspondence, photos or screenshots of cell phone contacts, etc.

Type of ID Theft

Do you believe your identity or medical information may have been compromised?

Were you contacted by a company or agency regarding a data breach?

If yes, who contacted you?

Was your identity used to open new accounts, etc.?

If other, please explain

What To Do Next?

Signature

Electronic Signature



Date **11/22/2022**

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **e39c506f-ff1f-406f-9d77-ef49512a6b3c**

Completion Date **6/11/2022 4:17:56 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titans USA**

Company Address **414 North Peters Road**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

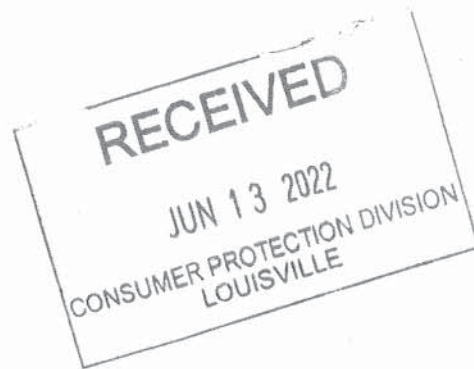
Company Phone **865-392-1036**

Company E-Mail [REDACTED]

Was a contract signed? **True**

Date(s) of transaction **May 23, 2022**

Product or service involved **Solar Panels**



Total Price **83,000**Amount Paid **0**

How did you hear about this product or service? **I filled out an online request to see if my area code qualified for solar Paul Peterson called sales rep. We set up an appt.**

With what other agencies have you filed a complaint? **Better Business Bureau complaint case# 8077249 sent June 5**

What action was taken by those agencies? **Yes the give the company 14 days to respond.**

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint? **I called multiple times to stop the transaction and no one called back. When I finally heard back from the company after I called Connexus to cancel the loan that Solar Titans had set up the company finally responded and told me I had only 3 days to have gotten out of contract. I told them I had called multiple times and written to their company with no response. I told them I would contact BBB and Attorney General. They dismissed me. No panels have been put on, no further contact from company or bank. I have discovered the company is unreliable and doesn't answer calls or pull permits before work. I am a single senior and I really need to get out of this.**

Briefly state the facts of your complaint **I signed a contract with Ideal Horizon Benefits/DBA. Solar Titans USA. After learning how unresponsive to calls I left messages that I wanted out of the contract. No one called back. I called the sales representative cell phone number and left the same message with no response. After going through the Better Business Bureau I found out they have 76 unresolved claims with only 10 ever getting resolution. BBB in Knoxville Tenn. [REDACTED] Consumer Specialist is handling it [REDACTED] complaint [REDACTED] reference [REDACTED] I talked with Mosaic connexus Credit union and they seemed cooperative to cancel the loan. Telephone [REDACTED] it was only after contacting the bank they Solar Titans finally called me. They said they wouldn't cancel the contract. There is a Whas news Focus on senior getting scammed by this company recently. Mosaic bank gave me a phone number to call to speak to a mediator. me to write an email explains all this**

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature [REDACTED]

Date **June 11 2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information **Connexus**

Account/Loan Number [REDACTED]

Email Address [REDACTED]

HIPAA Privacy Authorization

Healthcare Provider [REDACTED]

Electronic Signature [REDACTED]

Date **June 11 2022**Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **96e0de75-5cdf-4564-b6e3-da16219a8327**

Completion Date **6/2/2022 9:01:27 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan/Mosaic finance/ConneXus Credit union**

Company Address **2333 Alexandria Drive**

Company City **Lexington**

Company State **KY**

Company ZIP **40504**

Company Phone **865-392-1036**

Company E-Mail [REDACTED]

Was a contract signed? **True**

Date(s) of transaction **05/11/22**

Product or service involved **Installation of residential solar system**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **f20e9647-ee15-4a21-a1d5-f8d392fcb9a8**

Completion Date **3/8/2022 7:21:55 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone [REDACTED]

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **11205 Outlet Drive**

Company City **Knoxville**

Company State **TN**

Company ZIP **37932**

Company Phone **865-392-1036**

Company E-Mail **shawna@solartitanusa.com**

Was a contract signed? **True**

Date(s) of transaction **08/25/2020**

Product or service involved **16 KW Solar System**

Case 3:23-cv-00046-DCLG-JEM Document 67-4 Filed 02/23/23 Page 72 of 82 Page ID #: 3276

Total Price **\$72,200**Amount Paid **\$72,200 being financed**How did you hear about this product or service? **Don't remember???**With what other agencies have you filed a complaint? **none**What action was taken by those agencies? **none**Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **At least 26% off our contract as promised by Allen the sales person and the printed information that I collected off the website prior to it being taken down or the system reduced down 50% because of the all issues in trying to resolve this with the company.**

Briefly state the facts of your complaint **Allen, the sales person that came out told us that we would never have another electric bill. He also stated that we would receive a check from the IRS for 26% of the total price. Also, that the back would give us the lower payment, based on us handing the check over to them and keep our monthly payment the same provided we did it before the 17th payment or the payment would go up to \$584 vs. \$431. current. My tax person told me that no, you do not get the 26% back in a check but only in a tax credit. We told Allen that I was disabled and did not have any earned income. Since being disabled now for three years we have not owed any taxed back to the IRS which means that this offer does not help nor was what was told to both me and my wife Tina. The web site also states that you would receive a check from the IRS for the 26%. Now the company is telling me that this is my problem and they were not there to hear what the salesperson said and he was not longer with the company.**

Documents List

Filename

DOC.PDF

Download

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature

Date **03/08/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

3/9/22, 12:10 PM

https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm/Admin

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **f4fb496b-5e68-44c8-9de4-7c4c8e0fb684**

Completion Date **10/25/2022 2:14:54 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 N Peters Rd**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail **sandybrandt@solartitanusa.com**

Was a contract signed? **True**

Date(s) of transaction **4/21/2022**

Product or service involved **Solar panels**

Total Price **\$38,500**Amount Paid **\$690.48**How did you hear about this product or service? **Facebook**With what other agencies have you filed a complaint? **None**What action was taken by those agencies? **Did not complete solar panel install. They agreed to remove equipment but will not come.**Have you hired or retained an attorney? **False**Have you started court action? **False**

What action will resolve your complaint? **I would like to have an email from them stating a date and time they (Solar Titan USA) can come onsite after 3:30pm to come get their equipment and also stating that this would not hurt my credit. Also for Solar Titan USA to get in touch with Sunlight Financial to inform them that they are removing their solar system. Sunlight financial must also reimburse me money that I have already paid and that it will not hurt my credit. Lastly, to make sure that roof does not leak from where they mounted the solar panels and wiring on both sides of roof. The roof was in good condition beforehand and did not leak.**

Briefly state the facts of your complaint **I purchased a solar panel system for my home in April of 2022. I was told it would be operational within two months. The system was not operational as they had told me. I called them and they asked to give them a chance, which I did. They still did not get it operational. The system has bad components and a final inspection. I was paying roughly \$230 a month to Sunlight Financial plus paying \$250 a month for my electrical bill. I did that for two months until I had enough of it. I called Sunlight Financial and revoked their authorization from taking any more payment out of my checking account. I then explained to them why I did that and that I was done with it and would not be making any more payments. Sunlight Financial informed me that they would send the information over to their relation manager and have them to contact Solar Titan USA about removing their panels and equipment from my house/ property, then reimburse the 3 months payment that I had made, and not impact my credit.**

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **10/25/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information **Sunlight Financial**Account/Loan Number Email Address **customerservice@sunlightfinancial.com**

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **0c9d333e-72dd-4f16-8c59-3fa3378a46bb**

Completion Date **11/11/2022 12:35:13 PM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 North Peters Road**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **10/15/21**

Product or service involved **5 KW Solar System**

Total Price **\$38,250**

Amount Paid **Approximately \$11,000**

How did you hear about this product or service? **Radio Advertisement**

With what other agencies have you filed a complaint? **None**

What action was taken by those agencies?

Have you hired or retained an attorney? **False**

Have you started court action? **False**

What action will resolve your complaint? **Provide the solar power that we purchased!**

Briefly state the facts of your complaint **On around May 15, 2021, a Solar Titan agent (Brittany) told us that they would install a 5 KW solar system consisting of 16 solar modules that would reduce our electric bill by 70 to 90%. We started paying our loan on January 15, 2022. They installed only 13 solar modules on about the 15th of May 2022. I called the Knoxville office and they told me that they needed fewer modules since these were newer and more efficient modules. During the first 2 months of operation, the solar power was only 55 to 57% of the total usage. Again, On June 27, I contacted the Knoxville office and they told me that the internet connection to our system wasn't working and they would send out a technician to check it out. I called again on September 16 and they sent out two technicians and they reconnected the internet and checked the system and said that it appeared to be working correctly. No change! Suffice to say that we are receiving only 40% of total usage over the 6th month period of operation.**

Document Upload

Electronic Signature

I Acknowledge **True**

Electronic Signature

Date **November 11, 2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

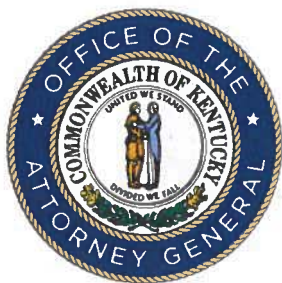
HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**



ATTORNEY GENERAL **DANIEL CAMERON**

Secure Online System

Application Information

Submission Id **9d80a3bf-064b-4073-a824-c875eb34dcde**

Completion Date **8/2/2022 10:19:18 AM**

Consumer Complaint and Mediation Form

Name [REDACTED]

Address [REDACTED]

City [REDACTED]

State [REDACTED]

ZIP/Postal Code [REDACTED]

County [REDACTED]

Home Phone

Mobile Number [REDACTED]

E-Mail [REDACTED]

Are you Active Duty Military? **No**

Company or person your complaint is against **Solar Titan USA**

Company Address **414 N Peters rd**

Company City **Knoxville**

Company State **TN**

Company ZIP **37922**

Company Phone **865-392-1036**

Company E-Mail

Was a contract signed? **True**

Date(s) of transaction **2/22/22**

Product or service involved **Solar**

Total Price **27,000.00**Amount Paid **136.78**How did you hear about this product or service? **Internet**With what other agencies have you filed a complaint? **None**What action was taken by those agencies? **Na**Have you hired or retained an attorney? **False**Have you started court action? **False**What action will resolve your complaint? **Solar titan completing the job, which is concealing the wires from solar panels down to the box in a metal conduit as required by county inspection**

Briefly state the facts of your complaint **My Panels are on my roof they ran the electrical but have not returned to finish the job. The final inspection will not pass due to their negligence of encosing the wires in a metal conduit. They refuse to finish the job they have made excuse after excuse. They say they are coming but do not show up. They promised to have these up and running in 45 days from signed contract. Its been 5 months is, I**

Document Upload

Electronic Signature

I Acknowledge **True**Electronic Signature Date **8/2/2022**

Authorization to Release Information

Name of Company/Agency Authorized to Release Information

Account/Loan Number

Email Address

HIPAA Privacy Authorization

Healthcare Provider

Electronic Signature

Date

Verification **PASS**

Utility Complaint Form Admin

Application Information

Submission Id **e739b2bd-b219-465a-9fb4-e8f8d95e43b5**

Completion Date **9/13/2022 9:42:26 AM**

If you wish to remain anonymous, please check this box. **False**

First Name [REDACTED]

Last Name [REDACTED]

Your business (if applicable)

Primary Phone

Mobile Number [REDACTED]

Address [REDACTED]

Address 2

City [REDACTED]

County [REDACTED]

ZIP/Postal Code [REDACTED]

E-Mail [REDACTED]

Against what company or business is your complaint? **Solar Titan USA**

Business Phone **865-392-1036**

Business Address **414 N Peters Rd.**

Business Address 2

Business City **Knoxville**

Business ZIP **37922**

Type of utility (if applicable)

Was a contract signed? **Yes**

Have you contacted the company or person regarding your complaint? **Yes**

If yes, with whom did you speak and what resulted from the contact? (include dates) **Justin**

Have you contacted a private attorney regarding your complaint? **No**

Have you contacted any other agency regarding your complaint? **Yes**

If yes, who? **BBB**

Additional details **Contract was for a 6000W solar system they installed a 3000w system. they put the panels in a bad location. they have dug up my yard twice (they messed up the conduit install the first time) they did not repair the yard the first time and have yet to finish the repair of the yard the second time. they won't communicate, they lie. I don't think there has been a certified worker involved in the install. MORE MORE MORE**

Verification **PASS**